

# **Fish, Wildlife & Parks Region 6 Prairie Dog Abundance and Distribution Objectives Plan**

**---Final Environmental Assessment---**

**Montana Environmental Policy Act**



***Montana Fish,  
Wildlife & Parks***

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# **Chapter 1: Overview and Summary**

## **Proposed Action**

The Final Region 6 Prairie Dog Abundance and Distribution Objectives Plan (the Final Plan) tiers from Objective #2, Strategy B of the statewide Conservation Plan for Black-Tailed and White-Tailed Prairie Dogs in Montana (MPDWG 2002) formally adopted by Fish, Wildlife & Parks (FWP) in 2002. Objective #2 of this statewide plan called for the development of statewide and regional prairie dog distribution and abundance standards. Objective #2, Strategy A outlines statewide distribution and abundance standards. Objective #2, Strategy B calls for the development of regional distribution and abundance standards to cumulatively meet the statewide standards. Strategy B further called for the regional standards to be developed at the local level and includes considerations for the development of these standards. The primary purpose of the Final Plan is to provide specific acreage and complex objectives for prairie dogs within the Region 6 FWP boundary in northeast Montana in accordance with Objective #2, Strategy B. Region 6 is the first FWP Region to develop a prairie dog abundance and distribution plan.

Originally, the Plan was intended not only to identify the distribution and abundance standards but also to meet the requirements of the Montana Environmental Policy Act (MEPA). As the Final Plan developed, FWP determined that an Environment Assessment (EA) would better meet MEPA requirements. Therefore, much of the language of the Plan and EA will appear similar.

## **Purpose and Need for Proposed Action**

The purpose of the Proposed Action is to help assure the long-term conservation of sustainable prairie dog and associated species populations in FWP Administrative Region 6. Furthermore, the purpose is to comply with the requirements outlined in the Conservation Plan for Black-Tailed and White-Tailed Prairie Dogs in Montana (MPDWG 2002) while continuing to meet its statutory and regulatory requirements for management of Montana's fish and wildlife resources.

Over their range, black-tailed prairie dogs have declined in abundance and distribution primarily as a result of extensive poisoning, loss of habitat, and plague. The prairie dog is an important native component of prairie ecosystems and provides unique habitat for a variety of associated species. Prairie dog conservation planning has been underway in Montana since the late 1980's when black-footed ferrets were being considered for re-introduction into parts of eastern Montana (MPDWG 2002).

The Montana Prairie Dog Working Group was organized and initiated development of a statewide prairie dog conservation plan in 1996. This effort was accelerated in 1998 when two range-wide petitions to list the black-tailed prairie dog as "threatened" under the federal Endangered Species Act were received by the U.S. Fish and Wildlife Service (USFWS) (MPDWG 2002). Upon review of the petitions and related information compiled by the involved states and after extensive public comment, the USFWS determined that listing of the black-tailed prairie dog was warranted but precluded due to a number of higher priority species also being

considered for listing (65 FR 5476). As a result, the black-tailed prairie dog was designated a “candidate species” in early 2000. As part of an annual review, the black-tailed prairie dog was dropped from candidacy by the USFWS in August 2004 (69 FR 51217). On February 2, 2005, the USFWS received a Notice of Intent to Sue regarding this finding from Forest Guardians et. al.

In 1998, states within the range of black-tailed prairie dogs organized the Interstate Prairie Dog Conservation Team to assess the range-wide status, threats, and conservation needs of prairie dogs and to develop a strategy that would help guide conservation efforts. That plan entitled, “A Multi-State Conservation Plan For The Black-tailed Prairie Dog, *Cynomys ludovicianus*, in the United States – an addendum to the Black-tailed Prairie Dog Conservation Assessment and Strategy, November 3, 1999” was published in 2003 (Luce 2003).

The Final Plan is an offspring of all these broader planning efforts. It reflects a commitment by FWP and its partners to manage for black-tailed prairie dogs in Region 6 in a manner that is in alignment with the statewide plan, and meets the needs of prairie dogs and associated species, as well as landowners, businesses, and recreationists.

### **Objectives of the Action**

The fundamental objective of the Proposed Action is to define prairie dog abundance and distribution standards in Region 6 that dovetail with the statewide plan to manage prairie dog populations and habitats to ensure long-term viability of prairie dogs and associated species. Additional objectives include identifying key considerations and an operational approach that will be used to define opportunities and constraints for where prairie dogs can be accommodated in Region 6 while considering the needs of landowners, agencies, wildlife, recreationists and Region 6 communities.

### **Relevant Plans, EISs, EAs, Regulations, and Other Documents**

In FWP Region 6, the Bureau of Land Management (BLM) is working under 3 separate resource management plans, affecting primarily BLM administered lands. They include: 1) The Judith, Valley, Phillips Resource Management Plan; 2) The West Hi-Line Resource Management Plan; and 3) The Big Dry Resource Management Plan. Each of these documents provides management objectives related to prairie dogs on lands administered by the BLM.

The Judith, Valley, Phillips Resource Management Plan (JVPRMP) includes Valley and Phillips Counties within Region 6. The JVPRMP includes an objective to manage for 26,000 acres (10522 ha) of black-tailed prairie dogs in Phillips County south of Highway 2, also known as the “7k Complex.” This is an overall objective including private, state, BLM, and USFWS-administered lands and reflects prairie dog levels observed in a 1988 survey. The primary intention of the 7k Complex is to re-establish a black-footed ferret population. Remaining portions of Phillips County as well as Valley County are not designated for ferret reintroduction and prairie dogs are intended to be managed at the 1988 levels and/or controlled based on the “values or problems encountered” (Record of Decision and Resource Management Plan Summary, JVPRMP and EIS, September 1994).

The West Hi-Line Resource Management Plan includes Hill, Blaine and Chouteau Counties within Region 6. This plan does not list specific acreage objectives and does allow for expansion and control of prairie dogs subject to policies regarding candidate, threatened, and endangered species. One particular prairie dog town is listed in the plan with an objective to manage to provide habitat for associated species and recreational shooting. Prairie dog towns under 10 acres (4 ha) will not be actively managed under this resource management plan.

The Big Dry Arm Resource Management Plan includes McCone, Richland, and Dawson Counties within Region 6. An acreage estimate of 2,500 acres (1012 ha) is reported for a larger 12-county area that is largely outside of Region 6. This resource management plan allows for natural fluctuations of prairie dogs and does not specifically prohibit control or expansion of prairie dogs.

### **Scope of Analysis**

This EA analyzes potential impacts of adoption of prairie dog abundance and distribution objectives in Region 6 considered for implementation by FWP and as described in five separate alternatives. Alternative E (Proposed Action Alternative) represents proposed actions by FWP that are identified in the Final Plan. Although this was developed through a collaborative effort involving state and federal agencies, non-governmental organizations, and individuals, the scope of this EA, undertaken as a requirement of MEPA involves only FWP actions. As federal agencies consider implementing related prairie dog conservation activities on agency-administered lands, these agencies will prepare separate analyses as per federal statutory requirements.

### **Decisions to be Made**

The Region 6 Regional Supervisor will make a Record of Decision that will guide future prairie dog conservation activities in Region 6 by FWP. The decision may adopt one of the alternatives or a modification of one or more of the alternatives and will be based on the efficacy of the proposed action(s) to achieve distribution and abundance objectives; the environmental impacts described in this EA; and the comments received through public review of the Draft Plan and this EA.

### **Other Agencies Having Jurisdiction or Responsibility**

Montana Fish, Wildlife & Parks is responsible for managing and conserving all resident, non-threatened or endangered wildlife species within the state. FWP has therefore been a leading partner in the development and facilitation of this planning process. Other resource agencies have also been involved with prairie dog planning including USDI Bureau of Land Management (BLM), US Fish and Wildlife Service (USFWS), and the Montana Department of Natural Resources and Conservation (DNRC).

## **Public Involvement Process**

Development of the Final Plan represents a collaborative effort involving a wide spectrum of stakeholders. The Conservation Plan for Black-Tailed and White-Tailed Prairie Dogs in Montana (MPDWG 2002) in Objective #2, Strategy B encouraged the formation of local working groups to facilitate the establishment of regional abundance and distribution objectives. It further identified that FWP was responsible for this effort. To that end, the Region 6 Prairie Dog Advisory Board (the Board) was established and protocols to develop regional abundance and distribution objectives adopted in a Collaborative Process Agreement.

The Board committed to informal, voluntary negotiations and developed a work plan, timelines and anticipated outcomes during the first meetings. Further, ground rules and decision-making processes were developed. The Montana Consensus Council facilitated meetings of the Board.

Representatives on the board were from Region 6 and elsewhere in Montana. Individual members were selected to provide a diversified perspective in the conservation and management of prairie dogs. The Board consisted of 12 individuals from the private sector, governmental agencies, and non-governmental organizations. These individuals represented the BLM, ranchers, local business, recreational shooting sports, Malta Chamber of Commerce and Agriculture, private landowners, USFWS, FWP, National Wildlife Federation, The Nature Conservancy, and Dept. of Natural Resources Conservation. All meetings were open to the public and participants from other organizations were invited to participate.

The Board developed a set of Key Considerations to be used in the development the Final Plan. Interested members of the Board developed and authored alternatives with the Key Considerations in mind. Three alternatives were authored by members of the Board and were reformatted and included in the Draft Plan. A fourth alternative (Alternative D, No Action) was developed by FWP in cooperation with managing agencies. A fifth alternative (Alternative E, Preferred Alternative) defining distribution and abundance objectives was developed through a collaborative process by board members. Portions of the previous 4 alternatives were included in Alternative E. Upon completion of the Draft Plan, it was submitted to the entire Board for comments and corrections.

In 2003, a group of landowners formed the South Phillips County Rancher Stewardship Alliance. Their purpose is to develop a ranching and wildlife stewardship plan that focuses specifically on black-tailed prairie dogs, black-footed ferrets, and sage grouse. Representatives from this group have been actively involved in the development of the Draft Plan. Additionally, Region 6 wildlife biologists met with many area landowners who currently have prairie dogs on their land and were not part of the Board. These meetings were intended to gather ideas and issues from landowners and to assess interest in potential prairie dog management options.

The resulting Draft Plan and Draft EA were released for public comment on November 19, 2005. FWP reviewed public comment and incorporated responses into the Final EA and Final Plan.



FWP Region 6 Supervisor made a decision regarding the FWP actions identified in the EA in the form of a Record of Decision.

### **Issues Identified Through Public Involvement**

Public involvement on the Draft Plan appeared to fully represent the spectrum of perspectives on most aspects of prairie dog management in Montana and Region 6. Some issues raised though are outside of FWP's authority and therefore outside the scope of this EA. A summary of issues involving FWP, listed by category type, follows. A more complete review of issues is covered in the Final Plan and other documents.

- Ecological Values

Prairie dog colonies enhance the heterogeneity of prairie ecosystems. Prairie dog management will affect the biodiversity and ecological processes of the prairie ecosystem. Prairie dogs also affect the rate of ecosystem processes including disturbance and nutrient cycling. Management of prairie dogs will have an impact on these processes as well.

- Associated Species

Prairie dog colonies provide associated wildlife species with food, shelter and required habitat features. Prairie dogs also serve as prey for a variety of predators. The black-footed ferret is an obligatory predator and also uses prairie dog burrows for shelter and protection. Many raptor species prey upon prairie dogs including golden eagles, ferruginous hawks, and prairie falcons. Other predators include badgers, coyotes, bobcats and prairie rattlesnakes. Other wildlife species use habitat features associated with prairie dog towns. The primary breeding habitat of burrowing owls is prairie dog towns. Mountain plovers prefer areas of extremely short vegetation created by sheep or prairie dog grazing and clipping of stems. Many other species are known to use prairie dog towns in Montana. Management of prairie dogs will have direct and/or indirect impacts on these and other wildlife species.

- Vegetation and Wildlife

The herbivory of prairie dogs alters the species composition and structure of plant communities. Native vegetation occurring on prairie dog towns is generally of earlier ecological succession compared to surrounding native prairie. Prairie dog towns typically support more annual forb and grass species and fewer perennials and shrub species. Changes in vegetation composition resulting from prairie dogs can have a positive, negative, or neutral effect on other wildlife species. Adverse impacts to vegetation and wildlife increases with increasing size of prairie dog colonies and closer spaced complexes.

- Livestock Grazing

Black-tailed prairie dogs feed primarily on grasses and forbs. The effect they have on forage availability for other grazers such as livestock is likely to vary by year and area. From a forage standpoint, livestock producers and resource managers generally consider the net effect of

prairie dogs to be a reduction in available herbaceous forage to livestock. This effect is likely to be exacerbated under drought conditions. Further, adverse impacts to livestock grazing increases with increasing size of prairie dog colonies and closer spaced complexes.

- Recreation

Black-tailed prairie dogs provide wildlife viewing and recreational shooting opportunities. In some parts of Region 6, these activities are of local economic importance. Recreational shooters and some landowner and business interests would like to retain remaining opportunities for recreational shooting.

- Control

Black-tailed prairie dog towns have the ability to expand and become established in areas where they are not desired. Control of these undesired prairie dog towns requires resources and personnel. Management of prairie dogs to meet distribution and abundance standards may facilitate their establishment in unwanted areas.

## **CHAPTER 2: AFFECTED ENVIRONMENT**

The following is a general summary of information taken from the Draft Plan. For more detailed information please refer the Final Plan.

### **Prairie Dog Status in Region 6**

- Legal Classification

The authority of FWP for managing prairie dogs originates from a number of statutes. The responsibility and authority to "supervise Montana's wildlife" are given to FWP (87-1-201, MCA). Prairie dogs are designated as nongame species under Montana statute 87-5-102, MCA. Montana statute 87-5-103, MCA declares that it is state policy to ensure perpetuation of nongame wildlife as "members of ecosystems." HB492, passed by the 2001 Montana Legislature, further established authority for FWP to designate prairie dogs as "nongame wildlife in need of management" and provides authority to establish management regulations. HB492 also affirms the ability of landowners to control prairie dogs on private lands.

Black-tailed prairie dogs are also classified by the Montana Department of Agriculture as vertebrate pests (80-7-1101, MCA) and as rodents for purposes of rodent control districts (7-22-2207(6) MCA).

- Abundance and Distribution

There are approximately 34,500 occupied acres (13,960 ha) of prairie dog towns in Region 6 based on current knowledge (Table 1.) and the most recent survey information available. The majority of data was collected from 2000 to 2003. However, some data was collected as early as 1996.

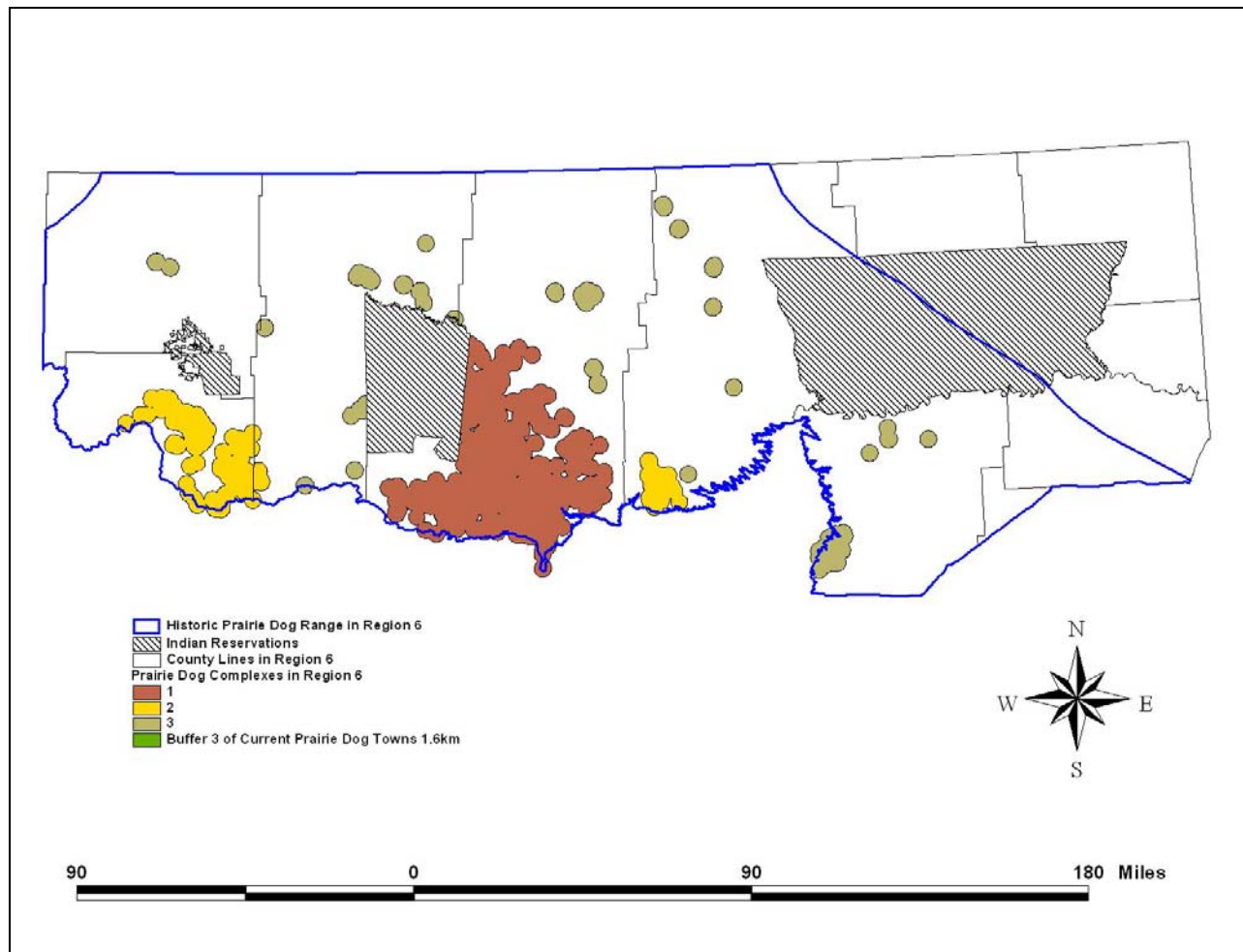
The statewide prairie dog plan (MPDWG 2002) provides for conservation of prairie dogs and associated species according to three categories of prairie dog complexes as determined by applying the 7 km rule for distance to nearest neighbor colony. The “7 km rule” is the convention adopted by the Interstate Black-tailed Prairie Dog Conservation Team. The physical description of a Category 1 complex in the statewide plan is defined as a complex of at least 5,000 acres (2023 ha) of prairie dogs, but may range up to 12,000 acres (4856 ha) following the 7 km rule. A Category 2 complex is defined as a complex of at least 1000 acres (405 ha) of prairie dogs following the 7 km rule. A Category 3 complex is defined as a complex less than 1000 acres (405 ha) of prairie dogs as defined by the 7 km rule plus scattered isolated colonies of any acreage.

Complex size and colony distance rules within a complex have been and are currently debated with regard to minimum requirements for the recovery of black-footed ferrets. The objective of a Category 1 complex is to provide sufficient habitat to sustain a viable population of black-footed ferrets. One mile (1.6 km) between colonies (known as the 1.5 km rule) and a minimum of 5,000 acres (2023 ha) occupied prairie dog habitat is an alternate definition of a complex that may support a viable population of black-footed ferrets (CBSG 2004).

Given the current understanding of prairie dog acreage and distribution, Region 6 supports one Category 1 complex of 24,720 acres (10,004 ha) under the 7 km rule (Table 1.) Under the 1.5 km rule, Region 6 does not support a Category 1 complex. The current known acres occupied by prairie dogs by Category 2 and 3 complexes in Region 6 are listed in Table 1. Locations of complexes by Category are displayed in Figure 1. Some of the colonies within these complexes experienced a plague epizootic event in 2005. Therefore, it is not known exactly how many complexes exist in Region 6 until mapping is completed in the fall and winter of 2005.

**Table 1. Known Prairie Dog Acres in Region 6 in 2004, by complex category (as defined by 7 km rule).**

Complex Category	Number of Complexes	Current Prairie Dog Acreage (ha)
1	1	24,720 (10,004)
2	3	6,383 (2,583)
3	22	3,415 (1,382)
Total		34,518 (13,969)



**Figure 1. Prairie Dog Complexes as defined by the 7 km rule in Region 6 outside of tribal lands.**

### **Prairie Dog Habitat**

- Biological and Physical Environment

Prairie dog towns in Region 6 occur more than expected in areas of Boralf soils and less than expected in areas of Ustert, Boroll, Orthent, Ochrept, and Argid soils (Rauscher 2004). Proctor (1998) also found that prairie dogs in his study in Region 6 were associated with clay-loam soils more than expected.

Rauscher (2004) found that prairie dogs occur more than expected where the slope is 3 percent or less and negatively associated with slopes of 4 - 6 percent. Proctor (1998) found that prairie dogs occurred more than expected on slopes of 0 – 4 percent.

Two independent GIS analyses (Rauscher 2004, Proctor 1988) using GAP Satellites Image Land cover showed that prairie dogs occurred more than expected in dry shrub land, badlands,

barren land, and upland grasslands. Prairie dogs occurred less than expected in dry land agriculture and moderate to high cover grasslands.

There are approximately 14,080,000 acres (5,700,000 ha) of historic prairie dog range within Region 6. Of that range, the major land use is associated with livestock grazing, 10,381,000 acres (4,201,000 ha). The remaining 3,706,000 acres (1,500,000 ha) are primarily associated with crop production.

Plague is known to be one of the primary causes for the range-wide decline in prairie dog distribution and abundance. Sylvatic plague epizootics in black-tailed prairie dog towns are not well understood. Until the processes of sylvatic plague epizootics are better understood and plague management techniques developed, achieving abundance and distribution standards may be problematic and difficult.

- Social Environment

Recreation associated with prairie dog towns in Region 6 consists primarily of prairie dog shooting. Although limited data exists, prairie dog shooting remains popular across Region 6 with the greatest activity in Phillips and Chouteau Counties. Other recreational activities associated with prairie dog towns include hunting of game animals, trapping and wildlife viewing.

## **CHAPTER 3: ALTERNATIVES**

The following is a summary of five prairie dog distribution and abundance alternatives that FWP might implement. A more complete description of each alternative is given in the Draft Plan. A comparison of distribution and abundance objectives are given in Table 3 at the end of this Chapter.

### **1. Alternative A**

- Abundance Objectives

This alternative calls for a minimum of approximately 27,000 acres (10,930 ha) of occupied prairie dog habitat in Region 6 not including the Charles M. Russell National Wildlife Refuge (CMR). This alternative does not define an upper limit on abundance, but instead allows the upper limit of prairie dog acreage to be defined by current landowner tolerance.

- Complex Objectives

Alternative A provides acreages within the 3 Complex types as follows:

One Category 1 complex of 5,000 or more acres (2,023 ha) of active dog towns spaced a maximum of 1 mile (1.5km) between towns. A 2-mile (3.2 km) buffer of the Category 1 complex would be kept free of prairie dogs; and, three Category 2 complexes of 1,000 or more acres (405 ha) of active dog towns. Each town within these complexes would be spaced a maximum of 4.4 miles (7km) apart. A 2-mile (3.2 km) buffer of all Category 2 complexes would be kept free of

prairie dogs; and, the remaining acreage of occupied prairie dog habitat would support Category 3 complexes of less than 1,000 acres (405 ha) each distributed over the historic prairie dog range in Region 6.

- Operational Approach

Under Alternative A, Region 6 would support prairie dog acreages that are based in part on landowner tolerance and the ability of incentives to facilitate planned prairie dog expansion while acknowledging commitments made in existing resource management plans.

Until workable incentives are developed, Phillips and Valley Counties would support an acreage ranging between 75% of the 1988 prairie dog abundance levels and up to the 1988 abundance levels. Because 1988 survey information exists only for Phillips and Valley Counties, other counties would use the most current survey information available for a benchmark level. Upon reaching the 1988 levels or benchmark levels, prairie dogs would be controlled to 75% of these levels during a single season.

In counties with fewer than 1,500 acres (607 ha) of occupied prairie dog habitat on public land, 1,500 acres (607 ha) of occupied prairie dog habitat on public land would be the benchmark level. Prairie dogs in these counties would be managed for a range of 75% of benchmark level to the benchmark level. Control would not be initiated in these counties until 1,500 acres (607 ha) of occupied prairie dog habitat was established. Prairie dog acreage in these counties would be allowed to expand to these levels naturally or could be actively managed through translocation into suitable habitat.

As effective incentives, including a control mechanism, become available planned expansion of prairie dogs on individual ranches would be allowed on a voluntary basis with no upper limits. Planned expansion of prairie dogs would only be initiated with willing landowners or permittees. Although shown as a countywide objective, actual management and acreage objectives would be managed at the allotment or ranch level.

A partnership of stakeholders would work toward development of one or more Rodent Control Districts or other type of prairie dog abatement program. This program would provide control measures on private, state, and federal lands, with the intent to maintain prairie dog acreage levels and to assure controlled expansion of prairie dogs under alternative objectives. Managing agencies and landowners would be responsible for funding prairie dog abatement on public and private lands, respectively, unless otherwise agreed to.

## **2. Alternative B**

- Abundance Objectives

Alternative B calls for approximately 49,000 acres (19,830 ha) of occupied prairie dog habitat in Region 6. This alternative does not define an upper limit on abundance, but instead allows the upper limit of prairie dog acreage to be defined by landowner tolerance.

- Complex Objectives

Alternative B provides a range of acreages within 3 complex types as follows:

Two Category 1 complexes not less than 10,000 acres (4,047 ha) of occupied prairie dog habitat spaced 40 miles (64 km) apart where active dog colonies within each complex are spaced a maximum of 1 mile (1.5 km) between colonies; and,

nine Category 2 complexes of at least 1,000 acres (405 km) of occupied prairie dog habitat that have a maximum of 1 mile (1.5 km) between colonies within the complex; and,

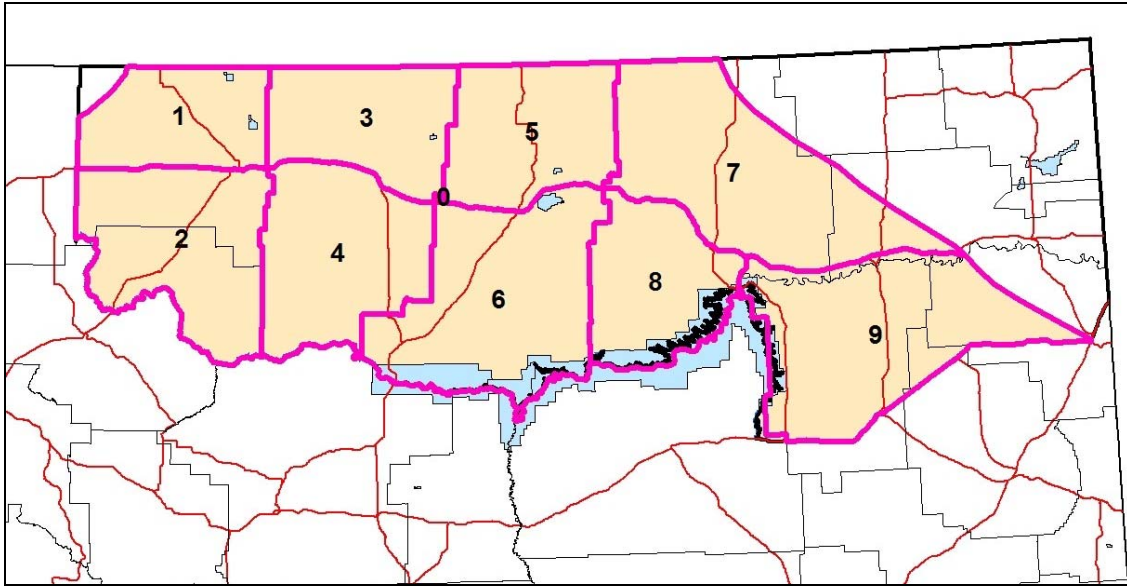
a total of 20,000 acres (8,094 ha) of occupied Category 3 prairie dog towns. A Category 3 complex under this alternative is defined as complexes and isolated colonies too small or too widely spaced to fit within Category 1 or Category 2 definitions.

- Operational Approach

Under Alternative B, Region 6 would work toward developing specific category complexes distributed over the project area. Both Category 1 and 2 complexes would be sited to maximize use of federal (i.e., NWR and BLM) and state lands. Tribal lands could also serve as sites for these complexes if a memorandum of understanding is in place between the tribes and FWP. However occupied acreages on tribal lands would be in addition to what is identified in this alternative.

Both Category 1 complexes under this alternative would be capable of supporting viable black-footed ferret populations. In areas where black-footed ferrets are to be reintroduced in an attempt to establish a permanent population, prairie dog expansion will be encouraged to the maximum extent possible with the concurrence of private landowners involved. If larger complexes are determined to be necessary for maintaining viable populations of prairie dog associated species other than ferrets; complex size and configuration will be redefined to reflect these needs. Further, Category 3 complexes would be distributed within 5 – 20 miles (8 – 32 km) of each Category 1 complex to provide for natural dispersal into Category 1 complex in the event of plague in the Category 1 complex. FWP would work with the Fish, Wildlife & Parks Commission (the Commission) to restrict recreational prairie dog shooting in areas inhabited by black-footed ferrets. Under this alternative, one Category 1 complex would be identified and managed for black-footed ferrets and associated species within a year of this plan's adoption. A second Category 1 complex would be identified and managed for ferret reintroduction within two years of this plan's adoption.

Complex 2 and complex 3 categories would be managed using nine proposed Prairie Dog Conservation Units (PDCUs) as illustrated in Figure 2. Within Region 6, PDCUs include areas where prairie dogs are known to have occurred historically. Highway 2, running west and east, separates northern PDCUs from southern ones.



**Figure 2. Boundaries of Proposed Prairie Dog Conservation Units in Region 6**

A Category 2 complex under this alternative would be developed in each of the PDCUs. These Category 2 complexes under this alternative would serve to support species that utilize prairie dogs and provide the potential to be converted into Category 1 complexes if made necessary by unforeseen events. As compatible, FWP would work to continue to allow prairie dog shooting on Category 2 and 3 complexes. Proposed sites for a Category 2 complex in each PDCU would be identified within a year of plan adoption and management of these sites to achieve Category 2 objectives would be initiated within two years of plan adoption.

Efforts would be made to maintain or develop Category 3 complexes within a 5 - 20 mile (8 – 32 km) radius of each Category 1 complex, which would help serve to re-establish a colony after a plague event. The objective for Category 3 complexes is to assure a widespread geographic distribution of prairie dog colonies throughout areas of acceptable habitat within Region 6, to provide refugia colonies that may be used to repopulate Category 1 or 2 complexes depleted by plague epizootics, and to provide for widespread distribution of species. Under this alternative, management would strive to achieve a distribution of Category 3 complexes and colonies within each PDCU in the same proportion that each PDCU has of the total original range of prairie dogs in Region 6 (Table 2.). Furthermore, PDCUs that maintain Category 1 or Category 2 complexes could subtract 200% of the acres in Category 1 or 2 from their Category 3 acreage targets. Where necessary to establish Category 3 complexes in areas not currently occupied by prairie dogs, the steps to initiate translocation will be initiated within a year of plan adoption and approved translocations will occur as soon as practicable thereafter.



**Table 2. Areas of PDCUs in Montana Fish, Wildlife and Parks Region 6 and estimated acreage occupied by prairie dogs.**

PDCU	TOTAL ACRES IN PDCU (ha)	ACRES CURRENTLY OCCUPIED BY PRAIRIE DOGS (ha)	% CURRENTLY OCCUPIED WITHIN PDCU	% OF REGION 6 AREA RANGE WITHIN PDCU
1	1,022,741 (413,898)	134 (54)	0.01	7
2	1,656,631 (670,429)	4,901 (1,983)	0.30	12
3	1,166,366 (472,022)	720 (291)	0.06	8
4	1,543,594 (624,684)	583 (236)	0.04	11
5	1,281,306 (518,537)	807 (327)	0.06	9
6	2,050,629 (829,878)	24,826 (10,047)	1.21	14
7	2,170,279 (878,300)	539 (218)	0.02	15
8	1,180,390 (477,697)	1,236 (500)	0.10	8
9	2,126,973 (860,774)	267 (108)	0.01	15
TOTALS	14,198,909 (5,746,220)	34,018 (13,767)	0.24	100

FWP would encourage appropriate federal, state, and private entities to target financial incentives to private and tribal landowners who are willing to maintain Category 1, 2 or 3 complexes. Incentives should be prioritized by complex with Category 1 complexes having the highest value. Complexes with the greatest amount of public land included are a higher priority as well. Participation by private landowners would be voluntary and at the landowners' discretion. This alternative would not impose restrictions regarding the control of prairie dogs on private land. Conversely, when translocations are deemed necessary, all translocations will follow Montana's translocation policy.

### **3. Alternative C**

- Abundance Objectives

This alternative calls for a minimum of approximately 30,000 acres (12,141 ha) of prairie dog habitat in Region 6. This alternative does not define an upper limit on abundance, but instead allows the upper limit of prairie dog acreage to be defined by current landowner tolerance. To reduce the cost and improve the feasibility of implementation, this alternative calls for managing acreage within a specified range (such as 33,000 acres, plus or minus 10%) as opposed to managing for a specific acreage target.

- Complex Objectives

Alternative C provides a range of acreages within 3 complex types as follows:

One Category 1 complex of 5,000-10,000 acres (2023 – 4047 ha) of active dog towns spaced no more than 1 mile (1.5 km) apart. Within this acreage range, the objective would be weighted toward 10,000 acres (4047 ha); and,

six or more Category 2 complexes of 1,000-2,000 acres (405 – 810 ha) of active dog towns. Towns within a complex would be spaced no more than 1 mile (1.5 km) apart. In total, this alternative would support approximately 10,000 acres (4047 ha) of active prairie dog habitat in Category 2 complexes; and,

approximately 10,000 acres (4,047) of Category 3 prairie dog towns would be scattered throughout the historic prairie dog range in Region 6.

- Operational Approach

As an initial step, a Partnership (individuals, agencies, and organizations who have an interest in prairie dogs and who are actively working toward and/or funding prairie dog conservation in Region 6) would work with landowners to maintain current acreage of prairie dog colonies while improving distribution to meet needs of associated species. Strategic alteration of current distribution and abundance to meet the identified goals of the Partnership would require voluntary agreements utilizing incentive programs and a demonstrated ability to control prairie dogs. This approach would include agencies, landowners, lessees, and neighbors who are apt to be affected by projects. The alternative would not focus prairie dog acreage on public lands in preference to other land ownerships. In this alternative, strategies would be employed that most effectively manage prairie dogs and build consensus among stakeholders throughout Region 6, blind to administrative boundaries.

This alternative calls for Category 2 complexes with no more than 1 mile (1.5 km) between towns. This arrangement would facilitate possible testing of the idea that ferret survival might also be possible on complexes of 1,000-2,000 acres (405 –810 ha) in size, and could provide alternative locations for transfer of the Category 1 complex, should the primary site for it fail or become infeasible.

Under the Alternative, FWP would work with the Commission to maintain recreational shooting opportunities for prairie dogs on public lands in Category 3 complexes, and in Category 2 complexes not hosting ferrets. Shooting opportunities on private lands would continue to be offered in accordance with landowner tolerance. FWP would also work with the Commission to prohibit prairie dog shooting in the Category 1 complex and other ferret recovery zones.

The Partnership would agree to provide control, at the landowners' request, of prairie dogs expanding from the Category 1 complex. This would establish a buffer zone around the Category 1 complex of up to 2 miles wide, where there would be control of prairie dogs across all land ownerships, if landowners requested such control.

#### **4. No Action Alternative**

- Abundance Objectives

This alternative calls for maintaining acreage objectives identified in current resource management plans (i.e., BLM Big Dry, JVP and West Hi-Line RMPs) and retaining current management practices. Under this alternative, approximately 26,000 acres (10,522 ha) of

occupied prairie dog towns, spaced a maximum distance of 7 km (4.34 miles) between towns, would be maintained in Phillips County (on an allotment-by-allotment basis) based on 1988 prairie dog survey data. In addition, 874 acres (354 ha) of occupied prairie dog habitat would be maintained in Phillips County outside the 7-km Complex based on the 1988 survey. In the Valley RA, 800 acres (324 ha) of occupied prairie dog habitat would be maintained and 71 acres (29 ha) in Judith RA. On other BLM lands in Region 6, BLM would allow for the natural fluctuation of occupied prairie dog acres on public lands. This alternative does not specifically prohibit control or expansion of prairie dogs.

- Complex Objectives

Alternative D provides acreages within the complex types identified in current resource management plans as follows:

One Category 1 complex of 5,000 or more acres (2023 ha) of active dog towns spaced a maximum of 4.34 mile (7km) between towns; and,

Category 2 and Category 3 complexes would not be actively managed other than to maintain 1988 levels.

- Operational Approach

Under Alternative D, Region 6 would support prairie dog acreages that are based on current resource management plans and current management policy. In Phillips County, BLM in cooperation with USFWS and FWP, and through cooperative agreements with CMR, DSL and private landowners, would maintain approximately 26,000 acres (10,522 ha), (12,346 BLM acres (4996 ha), 5,800 CMR acres (2,347 ha), 2,012 DSL acres (814 ha) and 5,827 private acres (2,358 ha)) of occupied prairie dog habitat within the 7-km Complex, based on the 1988 survey. In addition, 874 acres (354 ha) of occupied prairie dog habitat would be maintained in Phillips County outside the 7-km Complex based on the 1988 survey. BLM would maintain 12,346 acres (4996 ha), of prairie dog habitat on BLM land. However these acres may fluctuate according to guidelines in the JVP. If the BLM is able to make agreements through cooperative planning, BLM may reduce or exceed the 12,346 acres (4,996 ha) of occupied prairie dog habitat on BLM land within the 7km Complex. If the BLM cannot reach such cooperative agreements, then BLM will maintain the original 12,346 acres (4,996 ha) of occupied prairie dog habitat on BLM land within the 7km Complex. Prairie dog expansion beyond 1988 levels within the 7km Complex would not be allowed without mitigation. Any loss of livestock forage due to prairie dog habitat increases on BLM land above the 1988 survey levels would be mitigated through land treatments (mechanical, fire, etc.).

In the Valley RA, BLM would manage for 800 acres (324 ha) of occupied prairie dog habitat and in Judith RA, BLM would manage for 71 acres (29 ha) of occupied prairie dog habitat on BLM lands.

Under other Resource Management Plans, BLM would manage one town in the West Hi-Line Resource Area to provide habitat for associated species and provide recreational shooting

opportunity. Prairie dog acres under 10 acres (4 ha) would not be actively managed. On other lands in Region 6, BLM would allow for the natural fluctuation of occupied prairie dog acres on BLM lands.

Region 6 would not actively manage prairie dogs on private lands.

Further, FWP would work with the Commission to maintain current regulations already in place. Specifically, FWP would work with the Commission to maintain the regulation that closes the shooting of prairie dogs occupying public lands other than state school trust lands during the months of March, April and May. This regulation does not apply to privately owned lands. Further, FWP would work with the Commission to maintain the year-round prairie dog shooting closures on areas designated in Phillips County as black-footed ferret reintroduction areas known as the 40 Complex and Pea Ridge.

## **5. Alternative E (Preferred Action Alternative)**

- Abundance Objectives

The abundance and complex objectives of this alternative was reached by consensus of the Board. This alternative calls for managing active prairie dog acreage within a range from 30,500 acres to 41,400 acres (36,000 acres plus or minus 15%) as opposed to managing for a specific acreage target. This alternative does not preclude the expansion of prairie dog acreage above the specified range nor control within, above or below the specified range.

- Complex Objectives

Alternative E provides acreages within 3 complex types as follows:

One Category 1 complex of 5,000 + acres (2,023 ha) of active dog towns spaced no more than 1.5 km (1mi.) apart. This Category 1 complex will not be actively managed to exceed 10,000 acres (4,047 ha); and,

six to eight Category 2 complexes of 1,000 or more acres (405 ha) of active dog towns. Two or three of these complexes would follow the 1.5 km rule and the remainder would follow the 7 km rule; and,

Category 3 prairie dog towns would be scattered throughout the historic prairie dog range in Region 6.

- Operational Approach

While the abundance and complex objectives of this alternative were reached by consensus of the Board, the operational approach was developed by FWP using portions of the operational approaches found in the previous 4 alternatives. Implementation of Alternative E would be guided by the Key Considerations and accomplished by employing the tools and resources listed in this document. Effort would be made to avoid adversely affecting the agricultural and

local business economy. Additionally, this alternative would be implemented in such a way that it does not create unprecedented conflicts with other Species of Special Concern.

Management for complex objectives would achieve acreage objectives. If known active prairie dog acreages are within the specified range of acreage objectives upon adoption of the Plan, implementation would be directed toward reaching complex objectives. The highest priority would be given to establishment of a Category 1 complex of 5,000+ acres (2,023 ha). The next priority would focus on maintaining existing Category 3 complexes and establishment of Category 2 complexes given the lowest priority.

The establishment of a Category 1 complex as defined by this Alternative would be accomplished by allowing and/or facilitating natural expansion of existing prairie dog towns and/or translocation. Any translocations would follow the translocation protocols in Administrative Rules of Montana. Prior to initiation of actual on the ground work, e.g. translocation, the boundaries of this complex would be defined and all landowners and land management agencies within these boundaries contacted and be in agreement to establishment of this complex. If agreement by land management agencies and landowners cannot be achieved, the complex boundaries would be redefined until agreement is reached. Upon establishment of a minimum of 5,000 acres (2,023 ha) of active prairie dogs, additional acreage to this complex would be allowed to occur naturally without augmentation. It is not intended that this colony exceed a total of 10,000 acres (4,046 ha). After all regional plans are completed, if state plan objective of 2 Category 1 complexes is not achieved, Region 6 would give consideration toward developing a second Category 1 complex following statewide plan definitions of a Category 1 complex, which may occur within reservation boundaries if a MOU is agreed upon.

Establishment of Category 2 complex objectives would follow similar guidelines as the Category 1 complex objective. Initial priorities would be establishment or maintenance of two 1000+ acre (405 ha) complexes under the 1.5 km rule. These complexes should be separated by a minimum of 10 miles (16 km). Secondary priority would be establishment or maintenance of four 1000+ acre (405 ha) Category 2 complexes under the 7 km rule. At least 50 miles (80km) should separate two of these complexes. Category 2 complexes that exceed the minimum acreage by 1,500 acres (607 km) could be counted as two Category 2 complexes.

The objective of Category 3 complexes is to maintain the historic distribution of prairie dogs in Region 6. The focus of maintenance of existing and/or establishment of new Category 3 complexes would be in Blaine county north of Highway 2, Phillips county north of Highway 2, Valley county north of Highway 2, Hill and McCone Counties (referred to here as the Category 3 area). Currently, no prairie dogs are known to exist in those portions of Region 6 within the following counties: Roosevelt, Richland and Dawson. No effort would be expended to establish prairie dogs in those counties.

The current level of prairie dogs on a county-by-county basis represents a level of landowner tolerance. Effort would first be focused on securing the perpetuation of existing Category 3 colonies in the counties mentioned above. Further effort would be directed at searching for prairie dog towns that have yet to be documented in the Category 3 Area. Establishment of

Category 1 or Category 2 complexes in the Category 3 area would not be precluded. Re-establishment of Category 3 complexes as a result of a disease outbreak, stochastic event, etc. would follow the guidelines in Category 1 complexes.

All existing state and federal regulations would be followed, e.g. translocation protocol, shooting closures, etc.

**Table 3. Region 6 Prairie Dog Distribution and Abundance Alternatives Summary**

	<b>Category 1</b>	<b>Category 2</b>	<b>Category 3</b>	<b>Total Acreage</b>
<b>Current Situation</b>	<b>(1) 24,720 Acres 7 km Rule (0) 0 Acres 1.5 km Rule</b>	<b>(3) 6383 Acres 7 km Rule (6)* XXX Acres 1.5 km rule</b>	<b>(22) 3415 Acres</b>	<b>34, 518 Acres</b>
<b>Alternative A</b>	<b>(1) 5,000+ Acres 1.5 km Rule</b>	<b>(3) 1,000+ Acres 7 km Rule</b>	<b>Remaining Acres Distributed by County</b>	<b>26,785 Acres + CMR (6122 Acres) (32,907 Total)</b>
<b>Alternative B</b>	<b>(2) ± 10,000 Acres 1.5 km Rule</b>	<b>(9) 1,000+ Acres 1.5 km Rule</b>	<b>20,000 Acres Distributed by PDCU</b>	<b>Approx. 49,000 Acres</b>
<b>Alternative C</b>	<b>(1) 5,000 – 10,000 Acres 1.5 km Rule</b>	<b>(6) 1,000 – 2,000 Acres 1.5 km Rule</b>	<b>10,000 Acres Distributed Across R6</b>	<b>Approx. 30,000 Acres</b>
<b>Alternative D (No Action)</b>	<b>(1) 5,000 Acres 7 km Rule</b>	<b>Not Actively Managed</b>	<b>Not Actively Managed</b>	<b>Approx. 27,800 Acres</b>
<b>Alternative E (Preferred Alternative)</b>	<b>(1) 5,000+ Acres 1.5 km Rule</b>	<b>(6 – 8) 1000+ Acres (2-3) 1.5 km Rule (4-6) 7 km Rule</b>	<b>Maintenance of Existing Colonies Distributed in Category 3 Area**</b>	<b>30,500 – 41,400 Acres*** (36,000 +/- 15%)</b>

\*Some of the colonies within these complexes experienced a plague epizootic event in 2005. Therefore, it is not known exactly how many complexes and the total acreage of prairie dogs under the 1.5 km rule exist in Region 6 until mapping is completed.

\*\*Category 3 Area refers Blaine county north of Highway 2, Phillips county north of Highway 2, Valley county north of Highway 2, Hill and McCone counties. Establishment of Category 1 or Category 2 complexes in the Category 3 Area would not be precluded.

\*\*\*This alternative does not preclude the expansion of prairie dog acreage above the specified range nor control within, above or below the specified range.

## CHAPTER 4. ENVIRONMENTAL CONSEQUENCES

This chapter describes the environmental, economic, and cultural consequences of potential actions by FWP as described in the five alternatives in Chapter 3. A summary of FWP actions for each alternative is given prior to the review of environmental consequences. The analysis is limited to the issues raised through public involvement and other relevant considerations. Potential impacts are analyzed in terms of both the Physical/Biological Environment and the Human Environment.

For all alternatives except Alternative D (No Action), FWP would work within the framework of the Key Considerations and use the Prairie Dog Conservation Tools and Resources in the Final Plan. FWP would also facilitate the formation of an Implementation Committee comprised of agencies, organizations, landowners, and interested stakeholders that would help to guide the process. The Implementation Committee would use the operational approach in each alternative as a course of action for reaching alternative objectives. Some of the actions taken by FWP and/or other entities may be subject to further MEPA review, e.g. translocations.

The primary difference between the alternatives, although each has different operational approaches, lies in acreage and distribution objectives. The analysis of environmental consequences is limited to these differences. The No Action Alternative (4. Alternative D), representing current prairie dog distribution and abundance standards provides a basis for comparison.

### Summary of FWP Actions

#### *Alternative A*

Under Alternative A, FWP would work toward the distribution objective of establishing one Category 1 complex (1.5 km rule) of a minimum of 5,000 acres (2024ha), maintenance of the three existing Category 2 complexes (7km rule), with the remainder of the occupied prairie dog acres distributed within the historic range of prairie dogs in Region 6 on a county-by-county basis. Further this action would require altering prairie dog distribution to facilitate the establishment of a Category 1 complex under the 1.5 km rule without exceeding the acreage total. This action would require the establishment of an additional 5,778 acres (2,342 ha) of prairie dog towns in 5 counties. Consequently, this would require the removal of an equal acreage of prairie dog habitat within the remaining counties. FWP would take action to assist in the establishment of Rodent Control Districts or similar prairie dog abatement programs to reduce the total prairie dog acreage abundance of occupied prairie dog acres by a minimum of 1611 acres (720 ha). Further, this action would require control of prairie dogs in of a minimum of 23.5 mi<sup>2</sup> (61km<sup>2</sup>) surrounding the Category 1 complex, and 21.4 mi<sup>2</sup> (55.5km<sup>2</sup>) around each of the three Category 2 complexes for a minimum of 87.7 mi<sup>2</sup> (227 km<sup>2</sup>) of active prairie dog control. If effective incentives are developed, acreage totals may be exceeded and; therefore, a reduction of prairie dog acres may not be as pronounced.



### *Alternative B*

Under Alternative B, FWP would take action to expand prairie dog abundance to 49,000 acres (19,830 ha) of occupied prairie dog habitat, an approximate increase of 14,480 acres (5,860 ha). FWP would work towards the distribution goal of establishing two Category 1 complexes (1.5 km rule) of not less than 10,000 acres (4,048 ha) each, nine Category 2 complexes (1.5 km rule) of not less than 1,000 acres (405 ha) each, and 20,000 acres (8,094 ha) of Category 3 complexes distributed in 9 PDCU's. FWP would focus expansion of prairie dogs on federal lands to the extent possible. FWP would work with the Commission to restrict recreational shooting on prairie dog colonies where black-footed ferrets occur. Further, FWP would take action to assist other agencies and organizations in the development of financial incentives for private landowners willing to maintain prairie dog acres on their land.

### *Alternative C*

Under Alternative C, FWP would take action to maintain occupied prairie dog acres at a minimum of approximately 30,000 acres (12,141 ha) in Region 6. FWP would work toward the distribution goal of establishing one Category 1 complex of 5,000 – 10,000 acres (4,048 – 8,096 ha) under the 1.5 km rule, six or more Category 2 complexes under the 1.5 km rule and the establishment of up to an additional 6,585 acres (2,665 ha) of prairie dog acres across the region. Further, this alternative calls for controlling prairie dogs in a buffer zone of up to two miles wide surrounding the Category 1 complex, a minimum area of 23.5 mi<sup>2</sup> (61km<sup>2</sup>). Under this alternative, FWP would work to expand the current shooting closures to include the Category 1 complex.

### *Alternative D (No Action)*

Under Alternative D, FWP would not work within the framework of the Key Considerations and use the Prairie Dog Conservation Tools and Resources in the Draft Plan and would not facilitate the formation of an Implementation Committee. FWP would take action to work with management agencies to encourage compliance with prairie dog acreage objectives under current Resource Management Plans for a minimum of approximately 27,000 acres (10,930 ha) and to maintain a Category 1 complex of approximately 26,000 acres (10,522 ha). FWP would also take action to comply with Category 3 complex distribution objectives stated in Objective 2, Strategy B of the statewide plan. Further, FWP would work with the Commission to maintain current shooting regulations.

### *Alternative E (Preferred Action)*

Under Alternative E, FWP would take action to maintain a minimum abundance objective of 30,500 acres (12,344 ha) of active prairie dog towns. Further, FWP would take action to achieve a distribution goal of establishment of a Category 1 complex of 5,000 – 10,000 acres (2,024 – 4,048 ha) under the 1.5 km rule, maintain at least two category 2 complexes of 1,000+ acres (405+ ha) under the 1.5km rule, and a minimum of four Category 2 complexes of 1,000+ acres (405+ ha) under the 7 km rule while maintaining the historic prairie dog distribution in the

counties where prairie dogs currently exist in Region 6. Further FWP would work with the Commission to develop shooting closures and shooting regulations to assist in meeting these objectives.

## **A. PHYSICAL/BIOLOGICAL ENVIRONMENT**

### **1. LAND RESOURCES – Soil, Water, Air, and Vegetation**

This section considers impacts to soils and geology, water quality and quantity, vegetation, and air. This section addresses the ecological value and some of the vegetation issues identified through public involvement. None of the actions described in this environmental assessment would have an appreciable effect on air and geology. New proposed distribution and abundance standards in Region 6 by FWP can impact other land resources to varying degrees. Most of the impacts that would occur to land resources are beyond the control of FWP because they would result from a landowner taking actions on private property, other government agencies taking action on government-administered land, or result from another agency not taking actions. The quality and quantity of the resource impacted will depend more on actions taken by other entities and where and to what extent these entities take certain actions.

#### *Alternative A*

The net result of this alternative is a reduction in abundance of approximately 1,611 acres (652 ha) of occupied prairie dog habitat until effective incentives are developed. Based on significance criteria, we do not find any appreciable effects on soil, water, or air from Alternative A. The primary impact will be an overall increase in vegetative cover and a change in vegetative composition in the areas where prairie dogs are removed. This change would take time to be observed (Johnson-Nistler et. al. 2004). However, the opposite is true in areas where prairie dogs would be established. Local effects of this alternative would be more pronounced. Secondary impacts may include an increase in seed bank of weeds in areas where prairie dogs are removed and an increase soil erosion may occur in areas where prairie dogs are established due to a reduction in vegetative cover.

#### *Alternative B*

The net result of Alternative B would be an increase in abundance of approximately 14,500 acres (5,868 ha) of occupied prairie dog habitat over current levels. A major increase in the distribution of prairie dogs would be required under this alternative. The primary impact under this alternative would be an overall decrease in vegetative cover and a change in vegetative composition in the areas where prairie dogs are to be established. Local effects of this alternative would be very pronounced. Areas occupied by black-tailed prairie dogs are characterized by a decrease standing crop biomass, plant species richness, litter, standing crop crude protein, big sagebrush canopy cover and density, and an increase in bare ground and crude protein (Johnson-Nistler et. al. 2004). Further, an increase in soil erosion may occur in areas where prairie dogs are established due to a reduction in vegetative cover.

#### *Alternative C*

Under Alternative C, There would be no managed net increase of prairie dogs in Region 6 until effective incentives and effective prairie dog control have been demonstrated. Until that time, only natural expansion of existing prairie dog colonies would be allowed. Based on the significance criteria, implementation of Alternative C would not have any significant impacts on soils and geology, water quality and quantity, vegetation, and air until effective incentives and control methods developed. Following the development of incentives and control, there may or may not be a net increase in prairie dog acres, although there would be a change in prairie dog distribution. The primary impact in areas where prairie dogs are controlled would be an overall increase in vegetative cover and a change in vegetative composition. However, due to the heavy disturbance caused by prairie dogs, the recovery to original plant communities may be slow. The opposite is true in areas where prairie dogs would be established. The primary impact in areas where prairie dogs are established would be a decrease in standing crop biomass, plant species richness, litter, standing crop crude protein, big sagebrush canopy cover and density, and an increase in bare ground and crude protein (Johnson-Nistler et. al. 2004). An increase in soil erosion may occur in areas where prairie dogs are established due to a reduction in vegetative cover. Local effects of this Alternative would be pronounced.

#### *Alternative D (No Action)*

Under Alternative D, FWP would work with management agencies to encourage compliance with prairie dog acre objectives under current Resource Management Plans and with private landowners and other stakeholders to comply with acreage and distribution objectives. Based on the significance criteria, implementation of Alternative D would not have any substantial impacts on soils and geology, water quality and quantity, vegetation, and air.

#### *Alternative E (Preferred Action)*

Under Alternative E, there would not be a net significant impact to soils and geology, water quality and quantity, vegetation, and air unless current abundance levels are exceeded. The primary impact would occur in areas where prairie dog acreage were established to meet distribution objectives. In areas where prairie dogs are established, there will be a decrease in standing crop biomass, plant species richness, litter, standing crop crude protein, big sagebrush canopy cover and density, and an increase in bare ground and crude protein (Johnson-Nistler et. al. 2004). Further, an increase in soil erosion may occur in areas where prairie dogs are established due to a reduction in vegetative cover.

## **2. FISH and WILDLIFE**

New FWP actions intended to conserve prairie dogs, associated species, and their habitats are the focus of this environmental assessment. This section analyzes how each of the proposed actions could affect wildlife. This section addresses associated species and portions of the vegetation and wildlife issues identified through public involvement.

### *Alternative A*

The net result of this alternative is a reduction in abundance of approximately 1,611 acres (652 ha) of occupied prairie dog acres. Based on significance criteria, we do not find any substantial negative effects on prairie dogs or associated species. The primary impact of achieving the distribution objective of a 5000 + acre (2024 ha) Category 1 complex under the 1.5 km rule is expected to be a positive effect on black-footed ferrets. It is currently thought that black-footed ferrets benefit from black-tailed prairie dog complexes of > 5,000 acres (2024 ha) in size, distributed with a maximum prairie dog colony separation of less than 1 mile (1.6 km, CBSG 2004). A secondary impact of increasing the distribution of Category 3 complexes may be an increase in the distribution of some associated species. Certain fish and aquatic habitats may benefit from reduced sedimentation as a result of reduced soil erosion as controlled prairie dog towns develop increased vegetative cover.

### *Alternative B*

The net result of Alternative B would be an increase in abundance of approximately 14,500 acres (5,868 ha) of occupied prairie dog habitat. The primary impact of this increase would be beneficial to prairie dogs and associated species. Achieving the distribution objective of two 10,000 plus acres (4,047 ha) acre Category 1 complex under the 1.5 km rule is expected to have a positive effect on black-footed ferrets. It is currently thought that black-footed ferrets benefit from black-tailed prairie dog complexes of > 5,000 acres (2,024 ha) in size, distributed with a maximum prairie dog colony separation of less than 1 mile (1.6 km, CBSG 2004). A secondary impact would be an increase in the habitat availability for mountain plovers and burrowing owls. Other bird species that routinely use prairie dog colonies and would also benefit from increased habitat. However, species requiring substantial herbaceous vegetative cover or sagebrush, such as sage grouse, will likely be negatively impacted. Careful planning by the Implementation Committee would be required to minimize impacts on those species. Some fish and aquatic habitats may be negatively impacted from increased sedimentation from runoff from increased prairie dog acreages.

### *Alternative C*

Until effective incentives and control methods are established, there would be no net change in prairie dog abundance under Alternative C. Following the establishment of effective incentives and control methods, a net increase of prairie dog acres would benefit associated species. The primary impact of achieving a distribution objective of a Category 1 complex of 5000+ acres (2,024 ha) is expected to be benefit to black-footed ferrets. It is currently thought that black-footed ferrets benefit from black-tailed prairie dog complexes of > 5,000 acres (2,024 ha) in size, distributed with a maximum prairie dog colony separation of less than 1 mile (1.6 km, CBSG 2004). This alternative is not expected to have significant impacts to fish or aquatic habitats.

### *Alternative D (No Action)*

Based on the significance criteria, there would be no negative impacts to fish and wildlife under Alternative D. Habitat for associated species would not be increased. Habitat for black-footed

ferrets would not increase. A secondary impact of this alternative would benefit those species requiring substantial herbaceous vegetative cover or sagebrush from a lack of prairie dogs. This alternative is not expected to have significant impacts to fish or aquatic habitats.

#### *Alternative E (Preferred Action)*

Under the preferred Alternative, achieving distribution objectives will likely increase the abundance of prairie dogs. The primary impact of the increase in abundance would be positive effects on prairie dogs and associated species. Habitat availability for mountain plovers, burrowing owls and ferruginous hawks, would increase and other bird species that routinely use prairie dog colonies would also benefit from increased habitat. Secondly, those species requiring substantial herbaceous vegetative cover or sagebrush, such as sage grouse, may be negatively impacted. Achieving the distribution objective of one Category 1 complex of 5,000+ acre (2,024 ha) would benefit black-footed ferrets. It is currently thought that black-footed ferrets benefit from black-tailed prairie dog complexes of > 5,000 acres (2,024 ha) in size, distributed with a maximum prairie dog colony separation of less than 1 mile (1.6 km, CBSG 2004). This alternative may have negative secondary impacts to fish and aquatic habitats from increased sedimentation from runoff of increased prairie dog acres.

## **B. HUMAN ENVIRONMENT**

### **1. NOISE/ELECTRICAL EFFECTS**

New FWP actions identified in this environmental assessment would not result in any noise or electrical effects in the human environment. There were no noise/electrical effects identified through public involvement. Likewise, neither would there be any secondary, cumulative, nor significant noise or electrical impacts.

### **2. LAND USE**

This section considers impacts to lands and their uses, including productivity or profitability, lands with special designations, or impacts on residences. This section addresses the livestock grazing issues and to some extent, the control issues identified through public involvement. Since prairie dogs reduce the quality and quantity of preferred livestock vegetation, their presence can negatively affect land productivity and profitability. The vast majority of prairie dogs occur in grassland areas so very little cropland is expected to be affected by any FWP actions. New state actions analyzed in the environmental assessment would have little or no effect on current land use and would not negatively affect any scientific natural areas or cause the relocation of any residences.

#### *Alternative A*

This alternative would result in an additional 5,778 acres (2,338 ha) of prairie dog towns in 5 counties in Region 6 and an overall net reduction of approximately 1,500 occupied prairie dog acres (607 ha) in Region 6. The primary impact to some landowners in the 5 counties that

would have an increase in occupied prairie dog acres would be a reduction in land productivity and profitability due to a reduction in livestock forage. Until the exact locations of these increases are known, the amount of forage reduction would be difficult to estimate. Occupation by prairie dogs reduces livestock forage by 70% or more (Rich Adams, pers. comm.). A fiscal amount would be hard to calculate. However, given an estimated 10 – 15 acres per Animal Unit Month (AUM), an additional 5,778 acres (2,338 ha) of prairie dogs would cause an estimated net reduction of 270 – 400 AUMs or more. Secondary impacts could include a reduction in the profitability of some businesses in local communities that would see an increase in prairie dogs. Conversely, some landowners and businesses may see a net increase in land productivity and profitability where prairie dog abundance is reduced resulting from an increase in vegetation. However, recovery of prairie dog disturbance may take a long time (Johnson-Nistler et. al. 2004) and an increase in stocking capacity may take a long time to be realized.

#### *Alternative B*

This alternative calls for an increase of approximately 14,000 prairie dog acres (2,338 ha) in Region 6. The primary impact of a significant decrease in livestock forage on impacted lands would be a reduction in land productivity and profitability. Until the exact locations of these increases are known, the amount of livestock forage reduction would be difficult to estimate. Occupation by prairie dogs reduces livestock forage by 70% or more (Rich Adams, pers. comm.). Given an estimated 10 – 15 acres per Animal Unit Month (AUM), an additional 14,000 acres (2,338 ha) of prairie dogs would cause a net reduction of 650 – 980 AUMs. Secondary impacts could include a reduction in the profitability of some businesses in local communities that would see an increase in prairie dogs.

#### *Alternative C*

Because this alternative calls for maintaining existing occupied acres while establishing a Category 1 complex (1.5 km rule), and six Category 2 complexes (1.5km rule), there would likely be a net increase in prairie dog acreage under this alternative after effective incentives are developed. The amount of the impacted acres would be difficult to determine until the locations of the complexes are defined. On the impacted areas, there would likely be a net decrease in livestock forage of 70% or more (Rich Adams, pers. comm.), which would result in a decrease in land productivity and profitability. However, if effective incentives are developed, there would likely not be a net decrease in land profitability.

#### *Alternative D (No Action)*

This alternative will not have a significant affect on land productivity and profitability.

#### *Alternative E (Preferred Action)*

Because this alternative calls for the establishment of a Category 1 complex (1.5 km rule), two or three Category 2 complexes (1.5 km rule), and four or five Category 2 complexes under the 7 km rule, there would likely be a net increase in prairie dog acreage under this alternative. The amount of the impacted acres would be difficult to determine until the locations of the complexes are defined. On the impacted areas, there would be a net decrease in livestock forage of 70% or more (Rich Adams, pers. comm.), which would result in a decrease in land productivity and profitability. However, if effective incentives are developed, there would likely not be a net decrease in land profitability.

### **3. RISK/HEALTH HAZARDS**

New FWP actions identified in this environmental assessment would likely not result in any kind of hazard or health risks. Likewise, neither would there be any secondary, cumulative, nor significant impacts influencing or causing risks or health hazards. Although prairie dogs are known to carry sylvatic plague, there have been no reported incidences of sylvatic plague spreading to humans as a result of prairie dogs. There were no specific risk/health hazard issues identified through public involvement.

### **4. COMMUNITY IMPACT**

This section considers potential impacts to human distribution or population growth, social structure, employment opportunities, transportation, industrial or commercial activities or personal income. This section addresses portions of the livestock grazing and recreation issues identified through public comment. None of the alternatives are expected to have significant community impacts with the possible exception of personal income.

#### *Alternative A*

The primary impact to some producers in the 5 county areas having an increase in prairie dog acreage would be a minor reduction in personal income due to a reduction in livestock forage. However, if effective incentives are developed, these should compensate for any net decrease in personal income. Some producers may see an increase in income where prairie dogs are removed; however, it may take years for preferred livestock forage species to recover (Johnson-Nistler et. al. 2004).

#### *Alternative B*

The primary impact of a net increase of 14,000 acres (5,868 ha) of occupied prairie dog habitat would very likely be a pronounced decrease in personal income for some livestock producers. Also, the increased restrictions on recreational prairie dog shooting would likely negatively impact some local businesses, such as motels, gas stations, restaurants, and sporting goods stores.

### Alternative C

This alternative is not expected to have any negative impacts on personal income since it hinges on developing incentives for private landowners.

### *Alternative D (No Action)*

This alternative is not expected to have any negative impacts.

### *Alternative E (Preferred Action)*

This alternative is not expected to have an appreciable impact on personal income since private landowner agreement is necessary before new acreages are established for prairie dogs.

## **5. PUBLIC SERVICES/TAXES/UTILITIES**

New FWP actions identified in this environmental assessment would not result in any changes or impacts to public services, taxes, or utilities. There were no issues that developed from public involvement regarding public services, taxes, and utilities. There would not be any secondary, cumulative, nor significant impacts to public services, taxes, or utilities.

## **6. AESTHETICS/RECREATION**

This section considers impacts on scenic areas, vistas, designated wilderness areas, and on recreation and tourism. This section addresses the recreation issues identified through public comment. FWP actions described in this environmental assessment would not have an appreciable effect on aesthetic resources. Recreation, in the form of wildlife viewing and shooting, could be affected by the proposed alternatives. Whereas the Commission sets regulations, FWP may propose changes to shooting regulations based on this analysis and public response.

### *Alternative A*

The primary impact of this alternative may result in a slight increase in recreational shooting and wildlife viewing in the 5 counties that would have a net increase of prairie dog habitat. The opposite would occur in areas where prairie dog numbers are reduced.

### *Alternative B*



This alternative would result in a decrease of recreational shooting for prairie dogs; however, this would be partially offset by an increase in wildlife viewing opportunities for prairie dogs and associated species.

#### *Alternative C*

This alternative is not expected to have any major impacts although there may be a slight increase in wildlife viewing opportunities and a slight decrease in recreational shooting of prairie dogs.

#### *Alternative D (No Action)*

This alternative is not expected to have any major impacts.

#### *Alternative E (Preferred Action)*

This alternative is not expected to have any substantial impacts although there may be a slight increase in wildlife viewing opportunities.

## **7. CULTURAL/HISTORICAL RESOURCES**

New potential actions by FWP identified in this environmental assessment would not result in any impacts to cultural or historical resources. There were no issues identified from public involvement regarding cultural and historical resources. There would not be any secondary, cumulative, nor significant impacts on cultural or historical resources.

## **CONCLUSION**

### **Private Property Regulatory Restrictions**

Actions described in this environmental analysis do not regulate the use of private, tangible personal property, or real property under a regulatory statute adopted pursuant to the police power of the state; the proposed action does not involve the denial of an application for a permit or other permission; and the proposed action does not restrict the use of a regulated person's private property. Most proposed increases in prairie dog abundance and distribution would be accomplished using a voluntary, incentive based approach. None of the actions described herein would place regulatory restrictions on private property, therefore the proposed action does not require an evaluation of regulatory restrictions on private property (75-1-201, MCA).

### **Evaluation of Mitigation, Stipulations, and Other Controls**

There are no mitigation, stipulations or other controls associated with the proposed actions. Therefore, no evaluation is necessary. Mitigation requirements and stipulations are more often

appropriate for permitting procedures. The nature of the proposed action is to allow FWP to take actions that further conserve prairie dogs and associated species and would help with the recovery of the black-footed ferret. Therefore, it does not involve permitting or granting of a license on which stipulations would be placed.

#### Finding for Need of Environmental Impact Statement

In Chapter 4, Environmental Consequences, FWP analyzed the impacts of 5 alternatives. For each impact, FWP considered the significance criteria, as set out in 12.2.421, ARM, including a) the severity, duration, geographic extent, and frequency of impact; b) the probability that the impact will occur or reasonable assurance that the impact will not occur; c) growth-inducing or growth-inhibiting aspects of the impact, including the relationship of the impact or contribution to the cumulative impacts; d) the importance to the state and to society of each environmental resource or value affected; e) any precedent that would be set as a result of an impact of the proposed action that would commit the department to future actions; and f) potential conflicts with local, state, or federal laws, requirements, or formal plans.

Through these reviews, FWP determined that none of the effects associated with these alternatives would have a significant impact on the physical environment or human population in the area. An EA is therefore the appropriate level of analysis for the proposed action and an Environmental Impact Statement will not be required. Specifically, there are no significant impacts of the proposed action because Montana currently supports a healthy population of prairie dogs and each alternative is intended to maintain that. The degree to which the alternatives try to maintain and enhance that population vary, but all fit within the larger picture of what the United States Fish and Wildlife Service might or might not do, what other federal agencies such as the BLM, FS, and NRCS are able to do and last but not least, what individual landowners choose to do on their own property.

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## APPENDIX A

### PUBLIC COMMENTS ON DRAFT EA AND DRAFT PLAN

The Draft Fish, Wildlife & Parks Region 6 Prairie Dog Abundance and Distribution Objectives Plan – Draft Plan - was developed as a collaborative effort by the Region 6 Prairie Dog Advisory Board August 2005 over a 3-year period, starting in 2002. Advisory Board members included representatives of FWP, other state agencies, federal agencies, conservation organizations, agricultural organizations, private landowners, ranchers, local business, recreational shooting interests, and the Malta Chamber of Commerce and Agriculture. All meetings were open to the public and participants from other organizations were invited to participate. Advisory Board and public comments were incorporated into the planning process at several stages.

Originally, the Draft Plan was intended to identify Regional distribution and abundance objectives and also meet the requirements of the Montana Environmental Policy Act (MEPA). As the Draft Plan developed, FWP determined that an Environment Assessment (EA) would better meet MEPA requirements. A Draft EA was completed by FWP to analyze potential impacts of proposed FWP actions described in the Draft Plan, known as the Preferred Action Alternative (Preferred Alternative). A No Action Alternative along with three additional Alternatives was also analyzed in the Draft EA. The Draft EA and Draft Plan were released for public review on November 21, 2005. The 30-day public review period ended December 21, 2005. During the public review period, FWP mailed out approximately 40 copies of the Draft EA and Draft Plan and copies were also distributed at a Public Meeting in Malta on December 13, 2005. In addition, both documents were available for download from FWP's website and from the Region 6 Office. A total of 26 public comments were received for both the EA and the Draft Plan. From these comments, over 150 individual points were identified and have been organized into 15 issue-types, which are listed below with a response (in italics) from FWP. A double slash (//) is used to separate similar individual comments. In some cases, numbers in parentheses, e.g. (4), indicate the number of very similar comments. Words in parentheses were inserted by FWP for clarity. Some comments were editorial in nature and are not included here. In response to comments received, FWP developed the Final EA, Final Plan and Record of Decision.

#### 1. Abundance

If the acres in the plan are totaled, they don't come anywhere near the 30,000+ listed for total acreage.

*The Preferred Alternative calls for management for a range of prairie dog acreages between 30,500 – 41,400 acres (36,000 +/- 15%). The preferred alternative does not preclude the expansion of prairie dog acreage above the specified range nor control within, above or below the specified range.*

Alternative A is concise and has no upper limit on prairie dog acreages through voluntary incentive based programs.

*The language in Alternative A identifies specific acreage and complex objectives and does not define an upper limit on prairie dog acreages. The Preferred Alternative was partially developed from Alternative A to include this important concept. The language in Preferred Alternative was developed to allow the Implementation Committee the flexibility to utilize existing incentives and new incentive based programs as they are developed and to work with individual landowners and land management agencies to meet the acreage and distribution objectives.*

We have enough or too many prairie dogs now.

*The purpose of the Proposed Action is to help assure the long-term conservation of sustainable prairie dog and associated species populations in FWP Administrative Region 6. Furthermore, the purpose is to comply with the requirements outlined in the Conservation Plan for Black-Tailed and White-Tailed Prairie Dogs in Montana while continuing to meet its statutory and regulatory requirements for management of Montana's fish and wildlife resources. To meet these obligations, specific abundance and distribution objectives had to be identified with consideration towards the current abundance and distribution of prairie dogs in Region 6. The most current survey information indicates the abundance objective in the statewide plan of approximately 104, 000 acres has been reached. However, the distribution goals have not yet been achieved.*

## 2. General

I prefer that you leave the prairie dogs alone and let the Lord see to them. He will anyway.

*FWP Region 6 acknowledges this comment.*

## 3. Associate Species

Alternative B is the only alternative that honestly and adequately address the biological needs of wildlife associated with prairie dogs... // This alternative (Alternative A) meets all habitat criteria critical to prairie dogs and associated species...

*The alternatives, excluding the No Action Alternative, were developed within a specific framework of which, addressing the needs of associated species was a critical component. However, these alternatives recognize that there is incomplete understanding of the needs of many wildlife species associated with prairie dogs. Each Alternative subscribed to a unique set of assumptions within the realm of uncertainty. The Preferred Alternative was developed based on the best available science and professional opinions to ensure the continued survival prairie dogs and associated species without unduly impacting other wildlife species, private landowners and local economies.*

The reference to Knowles et al. 1982 does not account for mountain plover habitat in south Valley County or other areas where soil surface composition rather than sheep and prairie dogs is the determining factor.

*Mountain plovers are known to use areas not associated with prairie dog towns, as are other prairie dog associated wildlife species. The reference to Knowles et al. 1982. describes the reason for the relationship between prairie dogs and mountain plovers.*

The need of prairie dogs for ferruginous hawks may not be that important. Prairie dog towns may be critical to ferruginous hawks in other parts of the West, but not in Phillips and Valley Counties. The best populations of ferruginous hawks, and the ones most likely to account for "long-term survival" are far removed from prairie dog towns.

*Prairie dog associated wildlife species rely upon prairie dogs to varying degrees across their range. FWP Region 6 recognizes that the higher densities of ferruginous hawks in the state are not necessarily associated with prairie dog colonies. However, where the range of ferruginous hawks and prairie dogs overlap, the role of prairie dogs to ferruginous hawk survival cannot be dismissed.*

#### 4. Black-footed Ferret

To continue to manage for (black-footed ferret) recovery is crazy. // We feel that these understandings need to be known or ferret reintroduction discontinued before any proposal can be successful.

*The US Fish and Wildlife Service is solely responsible for recovery of the black-footed ferret and determines the direction and timing of recovery efforts in Montana. However, FWP Region 6 recognizes the importance of Montana to ferret recovery efforts. Currently, the best available information suggests that the limited amount of habitat, habitat quality, and disease are responsible for the lack of ferret recovery in the state. Region 6 FWP does not support expanding recovery efforts in Region 6 until habitat quantity and quality are improved as outlined in the Preferred Alternative. Nonetheless, Region 6 FWP acknowledges the importance of ongoing black-footed ferret research efforts in Region 6 to the recovery of the species.*

Although Alternative E uses the 1.5-kilometer rule, it only calls for a 5,000 acre Category 1 complex. As pointed out several times, this is not adequate for ferret viability. // Since ferrets depend completely on prairie dogs, it is especially important that if errors in management are to be made, that they be made on the side that gives such endangered forms the best chance for survival in Montana.

*The most current and best available information infers that a prairie dog complex of 5000+ acres in which the prairie dog colonies are not separated by more than 1 mile (the 1.5 km rule) will sustain a viable population of black-footed ferrets. Currently, no such complex is known to exist in Region 6 or Montana. The Preferred Alternative recognizes this information and calls for the development of a 5000 acre complex and also allows for expansion of this complex. However, it has not been proven that such a theoretical complex will sustain a viable population of black-footed ferrets in Montana. The Preferred Alternative allows for evaluation of this approach.*

This alternative (Alternative B) provides for two prairie dog complexes large enough to sustain a population of black-footed ferrets in Region 6... (11) // It is very unclear whether there are any other places in Montana where viable populations of ferrets can be established. Since the Montana plan calls for at least 2 Category 1 complexes capable of supporting ferrets, this argues for having 2 in Region 6 as proposed by Alternative B. // Finally, only Alternative B calls for two complexes adequate to recover viable black-footed ferret populations.

*The Conservation Plan for Black-tailed and White-tailed Prairie Dogs in Montana (MPDWG, 2002) calls for a minimum of two Category 1 complexes in the state capable of supporting black-footed ferrets separated by a minimum of 100 km. Region 6 FWP recognizes the importance of existing and potential prairie dog habitat in the region to ferret recovery. However, recent survey information (Knowles 2005) indicates increased potential for black-footed ferret recovery sites in other areas of Montana. Although survey methods did not allow classification of complex categories, Knowles (2005) estimated that there were approximately 90,000 acres of prairie dogs in southeastern and south-central Montana. FWP Region 6 believes it is in the best interest of all stakeholders and ferret recovery that areas similar to those indicated above are evaluated for potential ferret recovery sites and the remaining regional abundance and distribution standards developed prior to consideration of a second Category 1 complex in Region 6. Further, it is unproven at this time if a prairie dog complex of 5000+ acres with less than a mile separating the prairie dog towns in a plague environment will indeed support a viable population of black-footed ferrets. This theory needs to be evaluated prior to establishing 2 such complexes in Region 6.*

#### 4. Comment Period

... an alternative...was written up with essentially no time to comment on the document. // I would also recommend that Montana Fish, Wildlife & Parks postpone the December 19<sup>th</sup> closing date on comments for the Region 6 Prairie Dog Abundance and Distribution Objectives Plan. Many of my neighbors did not know about or have time to respond to the changes in this document.

*A mailing list of all attendees of the planning meetings was developed by Region 6 FWP. A letter was sent to each member of the list notifying them of the opening and closing dates of the comment period and inviting comment. As required by statute, a legal notice was sent all newspapers in Region 6 and elsewhere to invite public comment. Additionally, FWP Region 6 held a public meeting on December 13, 2005 in Malta to provide further opportunity for public comment. The notice of this meeting was announced on local radio stations and in local newspapers. The comment period was open for a period of 30 days. FWP Region 6 feels sufficient opportunity was provided for public comment.*

#### 5. Consensus

After several years of consensus building and work on respective alternative proposals of which, if no agreements could be made the Alternative D (the no action alternative) would be selected. // I cannot believe there was consensus at the meeting. If there was, it was after some of the people left. Therefore I don't think it should be published as such.

*The Advisory Board defined consensus in the Prairie Dog Advisory Board Collaborative Process Agreement, June 2003. For this Advisory Board, consensus was defined as follows: when at least half the Advisory Board members are present, and each member present can say they support the package of recommendations at hand, or at a minimum can live with the recommendations at hand, and no member relates that they cannot support the recommendations at hand. Nine members of the Advisory Board attended the Advisory Board Meeting on March 14, 2005 where the Preferred Alternative abundance and distribution objectives were determined. The Board members present verbally reached consensus on the abundance and distribution standards. Some key points however were later clarified by contacting individual Board members.*

## 5. Control

Prairie dogs are not looked upon as an asset on a ranch and the idea of 5,000 acres of them for just one town is not a pretty one. Especially if they are constantly spreading onto private land and needing to be controlled.

*The impacts of prairie dogs on individual ranches were analyzed in the Draft EA. The Preferred Alternative calls for a single 5000+ acre complex where individual colonies are one mile or less apart, not a single 5000 acre colony. Region 6 FWP recognizes that a large complex increases the potential of prairie dog emigration to areas where they are not desired. Through voluntary agreements and incentive based approaches, the need to control prairie dogs or the resources required for control can be mitigated in the vicinity of the 5000+ acre complex.*

There needs to be defined threshold trigger levels for prairie dog control on BLM and State lands... // There should be a very firm commitment to control. Not just expansion.

*FWP does not have regulatory authority for lands outside of properties in which they hold an interest. Federal and State land management agencies will determine when and how to initiate prairie dog control on administered lands. FWP Region 6 through the Implementation Committee and other avenues will be involved in this process.*

Don't think improvements by ranchers are bad and keeping dogs under control is terrible. It has proven to be far more beneficial to all than bad for the land...

*FWP Region 6 recognizes the wildlife value preserved and enhanced by the ranching community in Region 6. Further, FWP Region 6 recognizes prairie dog control as one management tool.*

I do not have a problem with control, but I do with extermination.

*The purpose of the Proposed Action is to help assure the long-term conservation of sustainable prairie dog and associated species populations in FWP Administrative Region 6.*



If prairie dogs are translocated onto BLM or private land, and expand onto adjacent private land, how does the FWP plan to control or protect adjacent landowners?

*Any translocations must comply with the translocation protocol as outlined in the Administrative Rules of Montana. A conflict resolution plan approved and signed by the landowner or land manager is required at the receiving site. The conflict resolution plan must detail any potential conflicts with private lands and proposed solutions for resolving these conflicts. Further, the conflict resolution plan must identify person(s)/party(s) responsible for implementing proposed solutions. A requirement of the conflict resolution plan is a statement signed by the landowner/land manager at the receiving area that acknowledges responsibilities to other landowners/land managers that will be incurred upon translocation of prairie dogs, and commitment to implement all provisions of the conflict resolution plan.*

## 6. Distribution

Six Category 2 complexes under the 7 km rule would meet all requirements of the state prairie dog working group plan.

*The Conservation Plan for Black-Tailed and White-Tailed Prairie Dogs in Montana calls for a total of 36,000 acres occupied by prairie dogs composed of at least 20 complexes of at least 1000 acres or more defined by the 7 km rule. The Preferred Alternative calls for six to eight Category 2 complexes of 1,000 or more acres of active dog towns. Two or three of these complexes would follow the 1.5 km rule and the remainder would follow the 7 km rule. It is not the intent of FWP Region 6 that Region 6 alone meets the requirements of the state plan for Category 2 complexes. Rather, that Region 6 makes a significant contribution to toward fulfilling goals for prairie dog abundance and distribution outlined in the Conservation Plan for Black-Tailed and White-Tailed Prairie Dogs in Montana.*

Alternative E needs to provide specific locations for Category 1 & 2 complexes and a distribution of Category 3 complexes. // Due to a lack of designated geographic areas in which either Category 1 or 2 complexes should be restored, Alternative E does not address prairie dog viability across Region 6.

*The Preferred Alternative was developed to give the Implementation Committee the needed flexibility to work with individual landowners and land management agencies to determine locations of prairie dog complexes. The Key Considerations outlined in the Draft Plan developed by the Advisory Board includes working with the willing, acknowledging past commitments in Resource Management plans, and development of incentives tailored to individual landowners. It is anticipated that this will be a lengthy process. Until the Implementation Committee can make the needed voluntary agreements with individual landowners and land management agencies, large complex locations cannot be defined.*

Alternative B also would break Region 6 into nine geographical units. ...(which) would prevent extirpation of prairie dogs from any significant portion of the historic range within Region 6. // We also urge adoption of Alternative B because it provides for a better distribution of Category II and

III colonies throughout the region... // We recommend at a minimum Alternative E is revised to include restoration of Category 2 complexes in geographical units throughout the historic range in Region 6, including in the north and west portions of Region 6. // (Alternative B) provides for a better distribution of smaller prairie dog complexes and colonies (13).

*As mentioned in the above response, the Preferred Alternative was developed to give the Implementation Committee the needed flexibility to work with individual landowners and land management agencies. FWP Region 6 believes the current distribution of smaller prairie dog complexes, Category 3 complexes, represents a level of landowner tolerance. Recognizing this, highest priority is given to those areas critical to maintaining the historic distribution of prairie dogs in Region 6 referred to in the Draft Plan as the Category 3 area. Further, control actions by land management agencies would require an environmental review process giving the implementation committee, FWP Region 6, the public and others the opportunity to comment on such actions.*

Alternative B is better because it provides for prairie dog management on public land because of the difficulties associated with private landowners (12). // Alternative B is better because it provides for prairie dog management on public land.

*To reach acreage and distribution objectives, it will take the cooperation of land management agencies and private landowners working together. Additionally, implementing prairie dog management on public lands directly affects permittees.*

(It) looks as if the 30,000+ Acres are just for Phillips County. // South Phillips County should not have to bear the brunt of R6 prairie dog acreages. // No certain bunch of ranchers should bear the brunt of too many prairie dogs. // No counties in R6 should be exempted from prairie dog abundance and distribution.

*The preferred alternative identifies specific distribution objectives that prevent the entire Region 6 abundance objectives from being located in a single county. The Implementation Committee, working with willing private landowners and land management agencies, will determine the location of the larger complexes of prairie dogs. However, FWP Region 6 recognizes that south Phillips County currently has the greatest amount of prairie dogs in Region 6 and will be given consideration for the Category 1 complex.*

Region 6 should not have to bear 2 Category 1 complexes. // Alternative B is only alternative that recognizes the amount of suitable unoccupied prairie dog habitat and therefore should have 2 Category 1 complexes. // Giving consideration for 2 Category 1 complexes in Region 6 is a disincentive for other Regions to develop another Cat 1 complex. //

*The Preferred Alternative calls for a single Category 1 complex of 5000+ acres under the 1.5 km rule. The Preferred Alternative also states that, if after all regional plans are completed, if the state plan objective of two Category 1 complexes, following the state plan definitions is not achieved, Region 6 would give consideration toward a second Category 1 complex. This statement was developed by consensus of the Board in recognition of the prairie dog habitat potential in Region 6. Current information suggests that a Category 1 complex under the 7 km*

*rule outside of Region 6 may already exist (Knowles, 2005). If this is indeed the case or if a new Category 1 complex is found, FWP Region 6 would not give consideration to a second Category 1 complex. Further, FWP is currently working with tribal wildlife agencies to develop a Memorandum of Understanding between the agencies regarding wildlife management that will likely include prairie dogs which would pave the way for development of a Category 1 complex in association with tribal lands. Finally, the development of a second Category 1 complex would require an evaluation under the MEPA process thus providing opportunity for additional public comment.*

Category 2 complexes should be under 7 km rule since they are not being managed for black-footed ferrets.

*The establishment of a minimum of two Category 2 complexes under the 1.5 km rule was reached by consensus of the Board. The Board's decision was based partially on using these complexes as experimental areas for black footed-ferret reintroduction and quality prairie dog habitat for other associated species. Current survey information shows that several of these complexes already exist in Region 6. A plague epizootic has affected some of these complexes. Until survey information is updated, it is unknown how many of these complexes still exist in the region.*

Apparently augmentation would not be allowed once a 5,000+ acre goal is reached and any increased beyond 10,000 acres would be discouraged rather than encouraged, possibly using direct lethal control.

*The Draft Plan only applies to actions by FWP. It does not limit private landowner management of their lands. The Preferred Alternative specifically states "This Category 1 complex will not be actively managed to exceed 10,000 acres..." FWP will not expend resources to expand the Category 1 complex beyond the upper limit of 10,000 acres. It does not limit the Category 1 complex from exceeding that amount. Further, as stated in the Draft Plan under the Preferred Alternative-Abundance Objectives, "This alternative does not preclude the expansion of prairie dog acreage of the specified range or control within above or below the specified range.*

One Category 1 complex of 5000 acres under 7 km rule.....The 1.5 km rule is unwarranted and scientifically indefensible.

*The purpose of the Proposed Action is to help assure the long-term conservation of sustainable prairie dog and associated species populations in FWP Administrative Region 6 including black-footed ferrets. The primary purpose of the Category 1 complex is to provide adequate habitat for black-footed ferret recovery. The most current and best available information suggests that a prairie dog complex of 5000+ acres in which the prairie dog towns are not separated by more than 1 mile (the 1.5 km rule) will sustain a viable population of black-footed ferrets.*

No default location for a 5000 acre complex if land owner consensus is not reached. // Unclear what will become of existing acreage when a 5000 acre complex is identified. Language needs to be clarified.

*Determining the location of a Category 1 complex will be incumbent upon the Implementation Committee working with private landowners and land management agencies. If individual landowner consensus is not reached, the Implementation Committee will continue working with various landowners and land management agencies to determine a location for the Category 1 complex. Until the Implementation Committee determines complex locations, the fate of existing prairie dog acreage will remain undetermined. Further, this plan only addresses actions by FWP. Actions by private landowners and land management agencies affecting existing prairie dog acreage are outside the purview of FWP.*

## 7. Economy

Alternative A reduces impacts on ranchers and local economy. // Loss of AUM's to prairie dogs has negatively affected economy.

*The Preferred Alternative is not expected to have an appreciable impact on personal income since landowner agreement is necessary before new acreages are established for prairie dogs. On the impacted areas, there would be a net decrease in livestock forage, which would result in a decrease in land productivity and profitability. However, effective incentives would mitigate a net decrease in land profitability.*

Loss of shooting has negatively affected economy.

*FWP does not have data to support that prairie dog shooting has increased or decreased recently. The Preferred Alternative does not restrict prairie dog shooting other than complying with existing state and federal regulations. Factors other than shooting closures or regulations may be responsible for a perceived decrease in prairie dog shooting, e.g. recent increases in fuel costs.*

Recreational shooting should not be restricted so as not to impact recreational income to the region.

*The primary purpose of the statewide plan and the Region 6 Draft Plan is to help assure the long-term conservation of sustainable prairie dog and associated species populations in FWP Administrative Region 6. The Commission has decided that prairie dog shooting should be regulated for FWP to meet its statutory obligations. The Preferred Alternative follows the Commission's direction in stating that existing regulations would be followed including seasonal and permanent shooting closures. Additionally, it is the Commission who ultimately establishes prairie dog shooting regulations.*

## 8. Implementation

The Region 6 implementation process needs to be defined.

*The Draft Plan was developed to give the Implementation Committee the needed flexibility to work with individual landowners and land management agencies. However, the Draft Plan does give direction to the Implementation Committee by stating that the committee's charge is to assure implementation of the Plan will be done in a coordinated and biologically based manner within Region 6. Using a voluntary, incentive-based approach as described in the Draft Plan, the roles of this committee will be to: 1) identify priority focus areas for assuring conservation of prairie dogs and associated species; 2) help develop strategies and solutions in response to issues; and 3) to appoint one or more point persons to work directly with landowners and lessees.*

Implementation team should solicit input from individuals working on prairie dogs and associated species.

*The Draft Plan states that the Implementation Committee will include agency personnel from FWP, BLM, and USFWS, representatives from interested non-governmental organizations, and interested landowners or representatives from landowner organizations.*

Implementation team needs to map out scenarios as to how 1.5 km rule may affect livestock grazing and other wildlife species.

*One of the roles of the committee will be to develop strategies and solutions in response to issues, not the least of which will be impacts to grazing and other wildlife species.*

No alternative appoints a single individual for Plan Implementation.

*One of the roles of the Implementation Committee will be to appoint one or more point person(s) to work directly with landowners and lessees to ascertain interest and customize an approach for working on a particular area or property. FWP Region 6 is ultimately responsible for implementation of this plan.*

...begs the question of whether a time frame for implementation of the plan should be specified.

*The Draft Plan states, "Execution of this Plan will be overseen and coordinated by an implementation committee.... The initial objectives of the implementation committee will be determination of members, establishment of meeting schedules, timelines, and work plans."*

## 9. Incentives

Alternative E does not have incentives for landowners that already tolerate more dogs.

*The Draft Plan does not specifically identify individual incentives. Individual landowners or lessees would ultimately be responsible for selecting an incentive that best fits their unique situation. Further, various incentives are currently being developed that could be applied to those landowners that currently maintain active prairie dog acres.*

I can see where monetary incentives will give some big checks.

*Individual landowners or lessees would ultimately be responsible for selecting an incentive that best fits their unique situation that may or may not include monetary compensation.*

## 10. Resource Management Plans

(The) JVP (Judith Valley Phillips Resource Management Plan) is a binding document that does not allow BLM to increase prairie dog levels above 1988 levels without voluntary participation by landowners and this needs to be stated in Alternative E.

*FWP Region 6 and the Board, in the Key Considerations for Prairie Dog Planning and Implementation acknowledged this important point. Alternative E references these Key Considerations.*

BLM has not kept prairie dogs at the 1988 levels. // (The) 1988 levels have not been adhered to.

*FWP does not have regulatory or management authority for lands outside of properties in which they hold an interest. Federal land management agencies, including the BLM, will determine when and how to initiate prairie dog control on administered lands in accordance with the JVP.*

Alternative E has no binding to the JVP. // FWP has an agreement with the people of Phillips County in the JVP. // How can any of the alternatives override the law that the BLM is required to manage by, the JVP? // Because the JVP is a binding agreement we feel we cannot support any of the proposed alternatives.

*As stated in the Key Considerations, the Board and FWP Region 6 acknowledges past commitments of public land and wildlife managers contained in the BLM's JVP obligation on BLM-administered lands. However, there is flexibility to plan and develop prairie dog acres above JVP levels on allotments through voluntary and incentive-based approaches.*

## 11. Plague/Disease

Having complexes close together increases likelihood of a plague event. // Greater distance than 1.5 km between smaller towns may reduce the spread of plague. // It is not wise to manage for even one 5000-acre dog town with plague in the area.

*Little is known about the mechanisms of a plague epizootic. It has not been shown that increased or decreased density of prairie dog towns increases or decreases the risk of a plague epizootic.*

Prairie dog towns recover quickly from plague. // Prairie dogs recover quickly from a plague epizootic.

*Recovery from a plague epizootic varies dependent upon several variables, many of which are unknown at this time. Recent research (Pauli 2005) suggests that a small percentage (<5%) of prairie dogs will develop resistance to plague during an epizootic. This relatively small number surviving an epizootic will take a considerable amount of time to return to pre-plague conditions, especially in a colony that is relatively isolated. The apparent quick recovery of some plagued out colonies may be attributed to immigration from nearby colonies.*

## 12. Sage Grouse

New prairie dog towns impact sagebrush and can have negative impacts on sage grouse. // Prairie dogs cause the loss of sagebrush and negatively impact sage grouse.

*The Implementation Committee is charged with implementing the plan in a coordinated and biologically based manner. FWP Region 6 recognizes that an adverse impact to vegetation and wildlife may increase with increasing size of prairie dog colonies and closer spaced complexes. It will be the charge of the Implementation Committee to minimize impacts to other species wherever possible.*

## 13. Shooting

Recreational shooting would be maintained, but people's perception is that it is closed.

*Information regarding Prairie dog shooting closures is posted on FWP's website and is also available at all regional offices. Further, FWP has published a brochure, also available at regional offices, that describes restrictions and regulations regarding prairie dog shooting as well as informational contacts in Region 6.*

All alternatives inadequately address viewing and shooting.

*Wildlife viewing and prairie dog shooting were important topics discussed by the Board and analyzed in the Draft EA. Implementation of the Preferred Alternative will likely increase viewing opportunities as complex objectives are reached and it is not anticipated to appreciably change prairie dog shooting opportunity.*

No shooter was allowed on the Advisory Board.

*Rod Boland represented prairie dog shooting interests on the Board. Further, economic interests, including recreational shooting, were represented by other members of the Board.*

There needs to be consistency in closures or there is not creditability when closure status is biased. // We recommend that FWP must prove that ferrets are present before any shooting closures are proposed.

*The Preferred Alternative states that existing regulations would be followed including shooting closures. The Commission is ultimately responsible for establishing prairie dog*

*shooting closures. Currently in Region 6, the only areas closed to year-round shooting are black-footed ferret reintroduction areas. There are voluntary closures on BLM administered lands for research purposes. It is anticipated that the Implementation Committee will recommend to the Commission to close the Category 1 complex to shooting when black-footed ferrets are introduced there.*

Fish, Wildlife & Parks should consider closing the prairie dog town near Nelson Reservoir if shooting of T&E or BLM Sensitive Status Species occurs.

*The Commission is responsible for establishing prairie dog shooting closures. The Preferred Alternative states that all state and federal regulations would be followed including any shooting closures established by the Commission.*

#### 14. Tribal Prairie Dog Acreages

Tribal prairie dog acreages should be counted in Region 6 inventory. Why are they not included?

*The statewide plan recognizes that tribal lands supports a potential contribution to statewide acreage and abundance objectives and gives direction to regional planning efforts. Until agreements with Tribes to coordinate prairie dog management are complete, Tribal contributions will not be considered as part of statewide abundance and distribution objectives. FWP is currently working with Tribal wildlife agencies to develop a Memorandum of Understanding between the agencies regarding wildlife management that will likely include prairie dogs. Upon completion of these agreements Tribally managed prairie dog colonies will be incorporated into statewide objectives to contribute to Region 6 abundance and distribution objectives as stated in the Preferred Alternative.*

#### 15. Vegetation

Prairie dogs increase erosion (from lack of vegetation and have impacted fish ponds). // There is a lot of erosion from this loss of vegetation on these towns too.

*The Draft EA evaluated the impacts to vegetation, soil and water. Implementation of the Preferred Alternative is not expected to significantly increase soil erosion over current levels.*

Expanding prairie dogs are reducing productive rangeland to a desert.

*The Draft EA recognizes where prairie dogs become established, there will be a decrease in standing crop biomass, plant species richness, litter, standing crop crude protein, big sagebrush canopy cover and density, and an increase in bare ground. Implementation of the Proposed Action is expected to increase these effects in a localized area.*